

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY

Caption in Compliance with D.N.J. LBR 9004-1(b)

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In re:

1 THRASIO ONE, INC.,

Reorganized Debtor.

META ADVISORS, LLC, solely in its capacity as Trustee of the
Thrasio Legacy Trust,

Plaintiff,

v.

JOSHUA SILBERSTEIN; CARLOS CASHMAN; DANIEL
BOOCKVAR; JOSEPH FALCAO; MOUNIR OUHADI; ADITYA
RATHOD; ARI HOROWITZ; EVERYTHING'S COMING UP
MILLHOUSE, LLC; CASHMAN FAMILY INVESTMENT II, LLC;
HUDSON PALM LLC; and YARDLINE CAPITAL CORP.,

Defendants.

Chapter 11

Case No. 24-11850 (CMG)

Adv. Pro. No. 24-01637

**NOTICE OF MOTION BY DEFENDANT JOSEPH FALCAO TO COMPEL
ARBITRATION AND STAY OR, IN THE ALTERNATIVE, TO DISMISS**

PLEASE TAKE NOTICE that, upon the Complaint in this adversary proceeding, including items referenced in or that are integral to the Complaint, the accompanying certification of Jae H. Cho, the exhibit thereto, and the accompanying memorandum of law, defendant Joseph Falcao a/k/a José Falcao (“Movant”) will move the United States District Court for the District of New Jersey, on the 24th day of June 2025 at 10:00 a.m. or such other date and time set by that Court, for an order, pursuant to 9 U.S.C. §§ 1 et seq. compelling plaintiff META ADVISORS, LLC, Trustee of the Thrasio Legacy Trust (“Plaintiff”), to arbitrate all claims as against Movant and to stay this action pending issuance of a final award or, in the alternative, dismissing all claims as against Movant pursuant Fed. R. Civ. P. 12(b), and for such other or further relief as the Court deems just and proper.

Dated: March 3, 2025

Felicello Law P.C.

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